

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

LAS UVAS VALLEY DAIRIES,
a New Mexico general partnership,

No. 17-12356-11

Debtor.

**UNSECURED CREDITOR COMMITTEE'S NOTICE OF TELEPHONIC DEPOSITION
AND REQUEST FOR PRODUCTION OF DOCUMENTS PURSUANT TO RULE 7030**

TO: Jonathan W. Joy and Las Uvas Valley Dairies
c/o George M. Moore and Daniel J. Behles,
Askew & Mazel, LLC
1122 Central Ave. SW, Suite 1
Albuquerque, New Mexico 87102

PLEASE TAKE NOTICE that pursuant to Rule 7030 of the Federal Rules of Bankruptcy Procedure, the Unsecured Creditors Committee ("UCC"), intends to take the oral, telephonic deposition of Jonathan W. Joy, as representative of the Debtor, Las Uvas Valley Dairies ("Debtor"), and in his individual capacity. The examination will be conducted telephonically by calling 888-809-5018, passcode 5058481871 and recorded stenographically before a certified Court Reporter on May 31, 2018 at the offices of Modrall Sperling, Roehl, Harris & Sisk, P.A., 500 Fourth Street NW, Suite 1000, Albuquerque, New Mexico, 87103-2168 ("Modrall Firm"), beginning at 10:30 a.m. MDT, and will continue thereafter from day to day until completed. The examination will include, among other things, the following subjects: (i) Debtor's financial records; (ii) contracts and leases of the Debtor; (iii) the assets and liabilities of the Debtor; (iv) the Debtor's general business operations, and the Debtor's Motion for Order Authorizing Auction Sale of Physical Sale of Assets.

Pursuant to Rule 7030(b)(2), the UCC further requests that the Debtor, Las Uvas Valley Dairies, on or before 3:00 p.m. on May 25, 2018, to the extent not previously produced, produce for inspection and copying the requested documents referred to in Exhibit "A" at the offices of the Modrall Firm.

DATED: May 21, 2017

MODRALL SPERLING LAW FIRM

By: /s/ Spencer L. Edelman
Paul M. Fish
Spencer L. Edelman
P.O. Box 2168
Albuquerque, NM 87103-2168
Telephone: 505.848.1800

ATTORNEYS FOR UCC

In accordance with NM LBR 9036-1 and Fed. R. Civ. P. 5(b)(2)(D), this certifies that service of the foregoing document was made this 21st day of May, 2018, via the notice transmission facilities of the case management and electronic filing system of the Bankruptcy Court.

By: /s/ Spencer L. Edelman
Spencer L. Edelman

EXHIBIT "A"

DOCUMENTS TO BE PRODUCED

1. All 2015 and 2016 tax returns for the Debtor;
2. Financial Statements for the Debtor for 2015 and 2016;
3. QuickBooks Portable Company File or Excel copies of the following Quickbook Reports for the period encompassing January 1, 2015 through the date of production: Sales by Customer Detail, Adjusting Journal Entries, Journal, Deposit Detail, Check Detail, Payroll Summary Transaction List by Vendor, and Transaction List by Customer;
4. Copies of the Debtor's bank statements from September 2016 to September 2017;
5. Copies of all payroll tax returns of the Debtor from September 2016 to September 2017;
6. Copies of quarterly reports prepared by Genske, Mulder & Co., LLP in 2015, 2016 and 2017;
7. Documents showing number of employees for the pay periods from January 1, 2017 through September 14, 2017;
8. Property tax records of the Debtor including bills and receipts for payments for 2017;
9. Amended Monthly Rations Report reflecting change described in Jim Roggow's letter dated April 17, 2018 to Dan Behles attached at Exhibit "B"; Debtor states it has produced report.
10. Amended Monthly Inventory reflecting revised inventory as described in Exhibit "B"; Debtor states it has produced report.
11. All contracts relating to the purchase of the "pre-paid feed" by the Debtor as disclosed on the last filed monthly operating report, including payments, amounts, tonnage delivered at what time, the costs for the amount delivered and the costs for the amounts outstanding for all of the pre-paid feed. Debtor has indicated there are no contracts.
12. All contracts relating to the current purchase of the "pre-paid feed" by the Debtor, including payments, amounts, tonnage delivered at what time, the costs for the amount delivered and the costs for the amounts outstanding for all of the pre-paid feed Debtor has indicated there are no contracts.